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**From:** Stuber, Robyn [Stuber.Robyn@epa.gov]  
**Sent:** 8/3/2018 10:18:37 PM  
**To:** Morris, Cris@Waterboards [Cris.Morris@waterboards.ca.gov]; Lim, Jeong-Hee@Waterboards [Jeong-Hee.Lim@waterboards.ca.gov]  
**CC:** Erickson, Elizabeth@Waterboards [Elizabeth.Erickson@waterboards.ca.gov]; Smith, DavidW [Smith.DavidW@epa.gov]; Stuber, Robyn [Stuber.Robyn@epa.gov]; Coupe, David@Waterboards [David.Coupe@waterboards.ca.gov]  
**Subject:** RE: oxnard with banner

Hi Cris, Jeong-Hee, and Elizabeth,

Fine work on drafting of the permit. I took a quick look at the permit and have the following comments. I did not review Attachment D and I only skimmed over the fact sheet. Please call me if you have questions regarding my comments.

WDR, page 1:

Delete reference to federal NPDES permit (above Table 1), as this permit is not jointly issued.

WDR, page 7:

Recommend separating the removal efficiency requirement for BOD and TSS into two separate lines. They are two separate parameters and need to be coded for ICIS/NPDES, as such, for compliance reporting. See also, related MRP comments re. clarifying BOD and TSS limits and monitoring for compliance.

WDR, page 17, provision x:

Check references to CWC sections 13385(h)(i) and 13385(h)(2) to confirm correct citation. The "i" reference seems misplaced to me.

WDR, page 18, provision aa:

Does the State's enforcement policy require that only one kind of penalty be applied to each kind of violation in all cases? If no, recommend deleting this provision, or editing it to be consistent with the enforcement policy.

WDR, page 19, provision 2.b:

Recommend deleting EPA from treatment plant capacity notification, as this is not a federal permit.

WDR, page 27, provision VII.C, for AMEL:

The term "single violation" jumps out. Is this term and its application to the AMEL required by the State's enforcement policy, statute, or regulation? My recollection, from the time I wrote the OCS D permit in 2012, is that "single violation" only applies to the calculation of MMPs. Generally, I'm cautious about permit writers "straight-jacketing" penalty calculation for enforcement staff via permit conditions, as it can preclude important and useful elements of enforcement discretion which the State and/or EPA may want to exercise in the future.

WDR:

Do Ocean Plan trash provisions need to be incorporated into the permit?

MRP, page E-10:

Add footnote 8 to TSS and clarify this footnote in relation to MRP, page E-9, IV.A, first paragraph, which seems to imply the following:

EFF-001A BOD, concentration and percent removal;

EFF-001A TSS, percent removal;

EFF-001B TSS, concentration.

I think it's fine to apply secondary treatment standards for BOD and TSS (both concentration and percent removal) at EFF-001A. However, in that case, I would add TSS percent removal to the combined effluents (EFFL-001B) as a TBEL, consistent with Ocean Plan Table 1.

MRP, page E-15, species sensitivity screening:

You asked me to provide draft language that addresses species sensitivity screening and the case Steven encountered with Hyperion. Please edit/revise as you see fit. DRAFT: If all results for species are "Pass" and "Percent Effect" are less than or equal to 10, then the Discharger may continue to test with the species chosen based on the most recent, previous species sensitivity rescreening, after consultation with and written direction from Regional Water Board staff."

Fact Sheet:

Can the fact sheet be revised to describe effluent quality in relation to monitored bacteria indicators of pathogens? Please note that some Regional Water Boards (e.g., RB2) set WQBELs for bacteria indicators using Dm, while others do not address Ocean Plan bacteria objectives and RP requirements at 40 CFR 122.44(d)(1). It may be beneficial for future fact sheets to explain why the effluent has no RP for bacteria indicator objectives and, as a result, WQBELs are not required.

Fact Sheet, page F-5, second paragraph:

Becky and I don't remember reviewing the mentioned work plan, final report and summary table for plume modeling results. Best delete reference to USEPA, unless you have our written comments in response to your request for review.

Fact Sheet, page F-32, provision 2, second paragraph:  
Change 403 to 402.

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**From:** Morris, Cris@Waterboards [mailto:Cris.Morris@waterboards.ca.gov]

**Sent:** Wednesday, July 11, 2018 6:24 PM

**To:** Stuber, Robyn <Stuber.Robyn@epa.gov>; Coupe, David@Waterboards <David.Coupe@waterboards.ca.gov>

**Cc:** Erickson, Elizabeth@Waterboards <Elizabeth.Erickson@waterboards.ca.gov>

**Subject:** FW: oxnard with banner

Here is the draft Oxnard NPDES permit for your review. I have also included the limit comparison table and some background information from Elizabeth below. Please let me know when you will be able to review this. If at all possible, I would like your comments by the 25<sup>th</sup>.

Thanks much,  
Cris

Background regarding this draft permit

The Oxnard Wastewater Treatment Plant (OWTP) has a design flow rate of 31.7 MGD secondary treated effluent which discharges through a one-mile outfall to the Ocean after mingling with brine from the Advanced Water Purification Facility (AWPF). The AWPF brine stream has a design flow rate of 3.1 MGD while producing 12.5 MGD of recycled water.

No new limits are imposed and the existing limits in Order R4-2013-0094 are maintained. A detection for Heptachlor epoxide allowed staff to remove the existing limit, which was based on a high detection level, because it is now known that there is no reasonable potential for the constituent to cause or contribute to an exceedance of the water quality objective. Existing limits for radioactivity are maintained because of an exceedance of a gross beta limit even though the source of the flow, probably an oil field brine, has now been eliminated.

A new dilution study demonstrated that the initial dilution ratio should be 1:108 instead of 1:98, however the change only resulted in a revision of the IWC used to test chronic toxicity.

The point of compliance for this NPDES facility No. CA0054097 changed during the term of the existing Order R4-2013-0094. The original point EFF-001A was located after the chlorine contact chamber, and was replaced by EFF-001B at a downstream blending station after the AWPB began discharging brine in April of 2016 into the secondary effluent waste stream. Due to the issue of obtaining a representative sample for Biochemical Oxygen Demand (BOD) at the EFF-001B sample blending station, the compliance point for BOD and BOD and TSS percent removal has been shifted back to EFF-001A. All other constituents are measured at EFF-001B.

The performance goals for Discharge Point 001 have changed based upon actual performance data for the Oxnard Waste Treatment Plan, but are selected to allow increased recycled water production during the permit term because they are specified only as an indication of the treatment efficiency of the plant. When data is otherwise lacking, Performance Goals were not reduced because future recycled water production may increase the discharge of brine.